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Attorneys for Defendant
BEL AIRE DISPLAYS, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

BOARD OF TRUSTEES OF THE
PRINTING SPECIALTIES AND PAPER
PRODUCTS JOINT EMPLOYER AND
UNION HEALTH AND WELFARE FUND,

Plaintiff,

v.

BEL AIRE DISPLAYS, a California
corporation,

Defendant.

CASE NO. C 06-4818 JCS

**STIPULATION AND ~~[PROPOSED]~~
ORDER TO EXTEND TIME TO
RESPOND AND TO MODIFY THE
INITIAL CASE MANAGEMENT
SCHEDULE**

This Stipulation is entered into between plaintiff Board of Trustees of the Printing Specialties and Paper Products Joint Employer and Union Health and Welfare Fund through its counsel of record, Erskine & Tulley, a Professional Corporation, and defendant Bel Aire Displays, Inc., by and through its counsel, Kenney & Markowitz L.L.P. The parties stipulate as follows:

1. The Complaint was filed in this action on August 9, 2006, at which time the Court issued its Order Setting Initial Case Management Conference and ADR Deadlines, which included an ADR meet and confer and Stipulation deadline of October 27, 2006 and an Initial Case Management Conference date of November 17, 2006.

2. Following service of the Complaint, the parties, through their counsel, entered into

1 meaningful settlement discussions which have resulted in an agreement to settle the action.

2 3. Defendant Bel Aire Displays has not yet filed its responsive pleading.

3 4. The parties stipulate to and respectfully request the Court grant an extension of
4 time of 30 days from the date of filing this Stipulation in which for Bel Aire Displays to respond
5 to the Complaint, and a 60 day continuance of the dates set forth in the August 9, 2006 Order, in
6 order to allow the parties adequate time to formally document the terms of the settlement and to
7 file a dismissal in the action.

8 DATED: October 27, 2006

KENNEY & MARKOWITZ L.L.P.

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11 By: 

STEPHAN E. KYLE
Attorneys for Defendant
BEL AIRE DISPLAYS, INC.

14 DATED: October 27, 2006

ERSKINE & TULLEY

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18 By: 

MICHAEL J. CARROLL
Attorneys for Plaintiff
BOARD OF TRUSTEES OF THE
PRINTING SPECIALTIES AND PAPER
PRODUCTS JOINT EMPLOYER AND
UNION HEALTH AND WELFARE
FUND

27
28 Kenney
&
Markowitz
L.L.P.

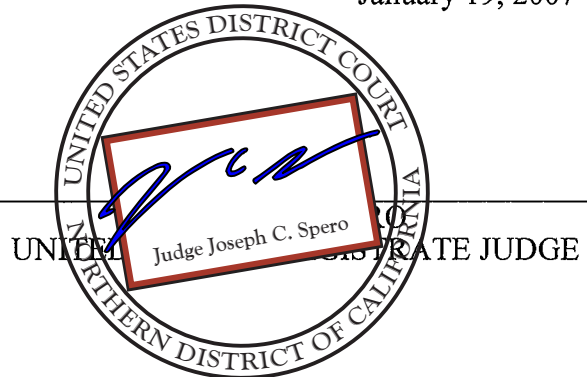
[PROPOSED] ORDER

Pursuant to the parties' stipulation and request for modification of the Court's Order Setting Initial Case Management Conference and ADR Deadlines, the following schedule shall apply to this case:

Bel Aire's Reponse to Complaint:	November 27, 2006
Meet and Confer re: initial disclosures, early Settlement, ADR process selection and discovery plan:	December 26, 2006
File ADR Certification signed by Parties and Counsel:	December 26, 2006
File either Stipulation to ADR Process or Notice of Need For ADR Phone Conference:	December 26, 2006
Last day to complete initial disclosures or state objection In Rule 26(f) Report, file Case Management Statement:	January 12, 2007
Initial Case Management Conference (CMC) in Ctrm A, 15 th Floor, SF at 1:30 p.m.:	January 19, 2007

IT IS SO ORDERED

DATED: October 30, 2006



Kenney
&
Markowitz
L.L.P.